

FILED

Jan 12 - 2021

AT O'CLOCK MINUTES
John M. Domurad, Clerk

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA)

v.)

Waqas AHMED)

Defendant.)

Case No. 8:21-MJ-18 (GLF)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date(s) of January 24, 2020 in the county of Franklin in the Northern District of New York the defendant(s) violated:

Code Section

8 U.S.C. § 1324(a)(1)(A)(ii) & (v)(I)

Offense Description

Knowingly and in reckless disregard of the fact that aliens have come to, entered, or remained in the United States in violation of law, the defendant did transport, move and attempt to transport and move, and conspire with others to transport and move, such aliens within the United States by means of transportation or otherwise in furtherance of such violation of law.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Attested to by Affiant.

 8-27

Complainant's signature

U.S. Border Patrol Agent Andrew Sutherland

Printed name and title

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: JAN. 12. 2021



Judge's signature

City and State: Plattsburgh, New York

Hon. Gary L. Favro, U.S. Magistrate Judge

Printed name and title

Continuation Sheet, United States v. Waqas AHMED

This criminal complaint is based on these facts:

On January 24, 2020, United States Border Patrol (USBP) agents arrested Nadeem BABAR for alien smuggling near Hogansburg, New York. At this time, BABAR was transporting two Indian nationals, Darshan PATEL and Rajanikantbhai PATEL. USBP agents determined that Darshan PATEL and Rajanikantbhai PATEL had recently been smuggled into the United States from Canada and were present in the United States illegally. During the smuggling event, BABAR was utilizing a Toyota Corolla with New Jersey license plates, which were registered to Waqas AHMED. At the time of arrest, BABAR presented USBP agents with a New Jersey driver's license in the name of Waqas AHMED.

During a post-arrest interview, BABAR admitted to purposely using AHMED's New Jersey driver's license in order to conceal his true identity. BABAR also admitted that he had traveled to the Hogansburg, New York area in order to complete the smuggling event, all at the direction of AHMED. BABAR admitted that AHMED offered to pay him \$500 for the smuggling event.

USBP agents analyzed BABAR's cellphone, which showed consistent and constant communications with AHMED during the smuggling event.